

HEATHER E. WILLIAMS, #122664
Federal Defender
NOA E. OREN, #297100
Assistant Federal Defender
Designated Counsel for Service
801 I Street, 3rd Floor
Sacramento, California 95814
Telephone: (916) 498-5700/Facsimile: (916) 498-5710
Noa.Oren@fd.org

Attorney for Defendant
ANGEL SANTIAGO RIVERA

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	Case No. 2:21-CR-00179-TLN
)	
Plaintiff,)	
)	STIPULATION AND ORDER TO
v.)	CONTINUE STATUS CONFERENCE AND
)	EXCLUDE TIME
ANGEL SANTIAGO RIVERA)	
)	Date: January 12, 2023
Defendant.)	Time: 9:30 a.m.
)	Judge: Troy L. Nunley
)	

IT IS HEREBY STIPULATED by and between Phillip A. Talbert, United States Attorney, through James Conolly, Assistant United States Attorney and attorney for Plaintiff, and Heather Williams, Federal Defender, through Assistant Federal Defender, Noa E. Oren, that the status conference for November 17, 2022 be continued to January 12, 2023 at 9:30 a.m.

The reason for this continuance is to allow defense counsel additional time to review discovery and investigate avenues for mitigation. The government has offered a plea in this case and defense counsel requires additional time to review the offer with her client who has been transferred.

Based upon the foregoing, the parties agree time under the Speedy Trial Act should be excluded from the date of the parties stipulation through and including January 12, 2023; pursuant to 18 U.S.C. § 3161 (h)(7)(A) and (B)(iv)[reasonable time to prepare] and General Order

1 479, Local Code T4 based upon continuity of counsel and defense preparation.

2 Counsel and the defendants also agree that the ends of justice served by the Court
3 granting this continuance outweigh the best interests of the public and the defendants in a speedy
4 trial.

5
6 DATED: November 9, 2022

Respectfully submitted,
HEATHER E. WILLIAMS
Federal Defender

7
8 /s/ Noa E. Oren
NOA E. OREN
Assistant Federal Defender
Attorney for Defendant
ANGEL SANTIAGO RIVERA

9
10
11 DATED: November 9, 2022

PHILLIP TALBERT
United States Attorney

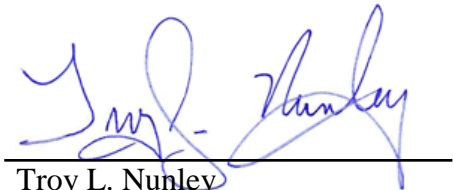
12
13 /s/ James Conolly
JAMES CONOLLY
Assistant United States Attorney
Attorney for Plaintiff
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

ORDER

The Court, having received, read, and considered the stipulation of the parties, and good cause appearing, adopts the stipulation in its entirety as its order. The Court specifically finds that the failure to grant a continuance in this case would deny defense counsel reasonable time necessary for effective preparation, taking into account the exercise of due diligence. The Court finds that the ends of justice served by granting the continuance outweigh the best interests of the public and defendants in a speedy trial.

The Court orders the status conference scheduled for November 17, 2022 be continued to January 12, 2023 at 9:30 a.m. The Court orders the time from the date of the parties' stipulation, up to and including January 12, 2023, excluded from computation of time within which the trial of this case must commence under the Speedy Trial Act, pursuant to 18 U.S.C. §§3161(h)(7), and Local Code T4.

DATED: November 10, 2022


Troy L. Nunley
United States District Judge